

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

DEFENDANT'S RESPONSE TO
GOVERNMENT'S SUPPLEMENTAL SENTENCING MEMORANDUM

The Court in its original judgment and sentencing committed the Defendant to the U.S. Bureau of Prisons to 60 months on Count II-Interstate Stalking.

The Defendant respectfully requests this Court in accordance with the 8th Circuit opinion vacating Defendant's conviction in Count II to resentence the Defendant from the original 420 months to 360 months.

For the foregoing reasons, the Defendant respectfully requests that the Court impose sentence in accordance with the recommendation made herein.

Respectfully Submitted,

/s/ John P. O'Connor

John P. O'Connor
Wagstaff & Cartmell LLP
4740 Grand Ave. Ste. 300
Kansas City, MO 64112
Phone: 816-701-1100

ATTORNEY FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that on the 9th day of May, 2022, I electronically filed the foregoing document on the Court's CM/ECF filing system, thereby sending notice of said filing to all counsel of record in this matter.

/s/ John P. O'Connor

Attorney for Defendant